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May 6, 2021

**By ECF**

Hon. William F. Kuntz, II  
United States District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Orellana Castaneda et al. v. County of Suffolk et al.*,  
2:17-cv-4267-WKF-ARL (E.D.N.Y.)**

Dear Judge Kuntz,

We represent the plaintiffs in the above-referenced action. On April 30, 2021, the parties jointly proposed to Magistrate Judge Lindsay a scheduling order that included a schedule for plaintiffs' anticipated class certification motion. On May 3, 2021, Magistrate Judge Lindsay entered an Order that, among other things, directed the parties to redirect the proposed class certification briefing schedule to Your Honor's attention, which we do so here.

In accordance with the Magistrate Judge's Order, and this Court's Individual Rule III.E. regarding the scheduling of motions, the parties have "set up their own briefing schedule" for Plaintiffs' anticipated class certification motion and hereby submit it to the Court for approval. Plaintiffs respectfully propose a June 18, 2021 deadline for their anticipated class certification motion, with the opposition due on July 16, 2021 and any reply due on July 30, 2021. This will allow the parties to complete the class certification briefing approximately one month prior to the dispositive motion deadline. Defendants do not oppose this request.

We thank the Court for its consideration.

Respectfully submitted,

s/Aldo A. Badini

Aldo A. Badini

cc: All Counsel of Record (**By ECF**)